

Deposition of Sergeant Sean Adams

Christopher Bush & David Bush V S.C Adams, et al.

Page 25	Page 27
<p>1 didn't do but.</p> <p>2 MR. SIMOPOULOS: He said Commonwealth's</p> <p>3 Attorney but.</p> <p>4 MR. PURICELLI: Sorry. Commonwealth's</p> <p>5 Attorney.</p> <p>6 BY MR. PURICELLI:</p> <p>7 Q Who was it that called the Commonwealth's</p> <p>8 Attorney?</p> <p>9 A I believe it was Detective Lawson.</p> <p>10 Q And you weren't present for that</p> <p>11 communication?</p> <p>12 A I don't believe so, sir. I don't recall.</p> <p>13 Q Do you recall if Lawson made a phone call,</p> <p>14 teletype, letter or how he communicated?</p> <p>15 A I believe it was a phone call.</p> <p>16 Q Do you recall anything of what Lawson may</p> <p>17 have represented of what he told the Commonwealth's</p> <p>18 Attorney?</p> <p>19 A I don't recall being privy to that</p> <p>20 conversation or the content of it. Just the notes</p> <p>21 that he made about it that I was able to review.</p> <p>22 Q Aside from the written notes that we have</p> <p>23 you don't recall anything else him specifically</p> <p>24 saying or left on the field notes?</p> <p>25 A I don't recall, sir.</p>	<p>1 supervise this particular unit?</p> <p>2 A Not that I recall. Just basically</p> <p>3 investigating crimes of that nature. Not</p> <p>4 necessarily supervision of the unit.</p> <p>5 Q Was there any specialized training to be a</p> <p>6 supervisor?</p> <p>7 A Yes. I've been to a few leadership</p> <p>8 classes. I don't recall specific dates or times.</p> <p>9 It's been more than one.</p> <p>10 Q Okay. With respect to the Bush incident,</p> <p>11 as I'm going to refer to it, you gave me four</p> <p>12 categories: Domestic violence, crimes against</p> <p>13 children, runaways and missing persons. Were there</p> <p>14 any other category activities that you use in that</p> <p>15 unit?</p> <p>16 A Every once in a while we'll catch</p> <p>17 something that doesn't fall neatly into one of those</p> <p>18 categories.</p> <p>19 Q Can we agree we'll call that miscellaneous</p> <p>20 category? Would that be fair for the purposes of</p> <p>21 this deposition?</p> <p>22 A Right.</p> <p>23 Q You've already identified it as one that</p> <p>24 doesn't fit neatly into one of the other four.</p> <p>25 Would there be any other type of classification of</p>
Page 26	Page 28
<p>1 Q As a result of his communication with the</p> <p>2 Commonwealth's Attorney did he come back and report</p> <p>3 to you what he had been instructed or advised?</p> <p>4 A I believe we spoke about it. He indicated</p> <p>5 that he had consulted juvenile court, and that it</p> <p>6 appeared to be a valid order from Pennsylvania.</p> <p>7 Q And what unit were you working?</p> <p>8 A Youth and Family Crimes Team.</p> <p>9 Q And what is that unit?</p> <p>10 A You're asking me the composition of it?</p> <p>11 Q Basically. What is the purpose of the</p> <p>12 unit?</p> <p>13 A The purpose of the unit is to investigate</p> <p>14 missing persons, crimes against children, crimes</p> <p>15 committed by children, domestic violence.</p> <p>16 Q Was any specialized training provided to</p> <p>17 you to work that unit and supervise that unit?</p> <p>18 A Yes.</p> <p>19 Q And was that training to work the unit?</p> <p>20 A Certain aspects of it: Missing persons,</p> <p>21 runaways. Domestic violence is an ongoing topic</p> <p>22 that we discover and service on a regular basis.</p> <p>23 Crimes against children I've been to conferences</p> <p>24 for.</p> <p>25 Q Was there any specialized training to</p>	<p>1 activities your unit would look into?</p> <p>2 A I'm not sure what you're referring to.</p> <p>3 Like sex crimes or something of that nature?</p> <p>4 Q I'm just looking to see what you and that</p> <p>5 unit principally handle so that I can either exclude</p> <p>6 those categories in this deposition and find out</p> <p>7 what you actually focused on.</p> <p>8 A I'm not sure. Do you want me to enumerate</p> <p>9 every sort of crime we investigate?</p> <p>10 Q Let's try it this way and see if we can</p> <p>11 shorten this up. With the Bush incident how would</p> <p>12 you classify that incident for the purposes of your</p> <p>13 report in your reporting system?</p> <p>14 A Ultimately, it's investigated as an</p> <p>15 abduction.</p> <p>16 Q Why was it classified that?</p> <p>17 A Because of the facts and circumstances</p> <p>18 that were developed.</p> <p>19 Q And what facts did you develop to indicate</p> <p>20 that it was an abduction?</p> <p>21 A Person without a valid, a person without</p> <p>22 the legal right legitimately obtained carried three</p> <p>23 children, noncustodial parent, across state lines.</p> <p>24 Q Okay. And were there any other facts</p> <p>25 other than those you just described that you relied</p>

Deposition of Sergeant Sean Adams

Christpher Bush & David Bush V S.C Adams, et al.

	Page 29		Page 31
1	on to classify David Bush's removal of the children	1	year. The content of the court order that I was
2	as an abduction?	2	given indicated that she had some nexus with Luzerne
3	A I'm sure there were other facts.	3	County which was found out to be untrue. She
4	Q Do they appear in the paperwork?	4	provided the vacate order of the, the order from
5	A At some point, yes.	5	Luzerne County. I vaguely recall mention of a
6	Q So I could read them and see what other	6	weapon or firearm being involved. And I believe
7	facts in your missing children's report?	7	there was also some discussion about the location of
8	A (No response.)	8	the children being in Pennsylvania, possible
9	Q I don't want to make you recall things	9	locations for Mr. Bush where he lived, and that the
10	that I can read is all I'm saying.	10	children were with him, and some domestic violence
11	A There are other facts that are involved in	11	previously that had occurred some years ago between
12	the case that may not be in here. I'm not saying	12	the two parties: Mr. and former Ms. Bush.
13	that there's 100 percent everything is written down.	13	Q Anything else?
14	Q Okay. I'm just looking for the facts to	14	A That's all I can recall at this time.
15	have it classified as an abduction. That's all.	15	Q You indicated that she had told you there
16	A I'm not sure I can answer that because I	16	were weapons and a firearm involved?
17	don't know exactly what you're saying.	17	A Possible firearm involved.
18	MR. SIMOPOULOS: Just clarify or rephrase	18	Q In regards to what?
19	it.	19	A In possessing one and the children being
20	MR. PURICELLI: Sure. I can rephrase it.	20	afraid of him or something along those lines.
21	I'll ask it a different way.	21	Q So when she told you about the weapon or
22	BY MR. PURICELLI:	22	firearm she was merely telling you he owned them?
23	Q You indicated to us that the Bush matter	23	Or was he using them in some manner that was
24	we're talking about was classified in your unit as	24	contrary to law?
25	an abduction?	25	MR. SIMOPOULOS: Objection to form.
	Page 30		Page 32
1	A Right.	1	THE WITNESS: (Reviews documents.) That
2	Q And you've given me some factors and	2	he may be armed with a 45 caliber firearm.
3	you've indicated there are others possibly why you	3	BY MR. PURICELLI:
4	classified this incident as an abduction. Does that	4	Q So the conversation that you had with her,
5	help you understand what I'm asking about?	5	this was after the children had already been turned
6	A All right. There's some content of	6	over to Mr. Bush pursuant to a Virginia Court Order?
7	conversation that I had with the victim, the victim	7	A Sir, what was the question?
8	being the mother of the children, which was not	8	Q The information that you're telling me,
9	reduced to writing which did have bearing on the	9	the conversation that you had with the mother, this
10	material facts to whether this would constitute an	10	was occurring after Mr. Bush had left Virginia --
11	abduction.	11	A Yes, sir.
12	Q Why don't you tell me what she told you.	12	Q -- with the children pursuant to a
13	MR. SIMOPOULOS: You're asking why it was	13	Virginia Court Order?
14	classified as an abduction; right?	14	A Not pursuant to a Virginia Court Order
15	MR. PURICELLI: Yes. And he's telling me	15	that I know of. It was pursuant to the Pennsylvania
16	the mother told him some other things other	16	Court Order.
17	than these. And I have to get it off his mind	17	Q You're not aware that there was a Virginia
18	right now because apparently he might be able	18	Family Court Order?
19	to think of others so let's get that off his	19	A I'd have to look back through my notes.
20	mind.	20	But at the time, no. I was not aware that there was
21	BY MR. PURICELLI:	21	a Virginia Court Order.
22	Q Why don't you tell me what the mother told	22	Q Can you check the file and see if there
23	you.	23	was any indication in there that the Virginia Family
24	A All right. She told me that she had lived	24	Court had authorized Mr. Bush to remove the
25	in Pennsylvania for quite some time, at least a	25	children?

Deposition of Sergeant Sean Adams

Christpher Bush & David Bush V S.C Adams, et al.

	Page 33		Page 35
1	A (Reviews documents.) No. There's nothing	1	or the parent from Pennsylvania has a valid court
2	in my file to indicate that Mr. Bush had a valid	2	order?
3	Virginia Court Order.	3	A That --
4	Q Okay. What is the policy, if there is a	4	MR. SIMOPOULOS: Objection. Speculation.
5	policy in the police department, for going to any	5	Go ahead.
6	schools to pick up children from school and turn	6	THE WITNESS: I'd probably have to get
7	them over to a parent who would be from out of	7	some legal advice on that. I would call the
8	state?	8	Commonwealth's Attorney's Office.
9	A You're asking me what the policy is?	9	BY MR. PURICELLI:
10	Q Yes.	10	Q And in this sort of fact scenario Lawson
11	A We don't typically deal with that a lot.	11	has already contacted the Commonwealth's Attorney?
12	But what we do interpret is who has the valid right	12	A In this case, yes.
13	to custody of the child. Now, whether you know,	13	Q Did you learn what that advise was from
14	whether they're picking them up from school or	14	the Commonwealth's Attorney?
15	whether they're picking up from another location and	15	A I found out at some point.
16	we're asked to facilitate transfer of children or a	16	Q At what point?
17	child, that's our primary function.	17	A That part I don't recall.
18	Q Were you aware that the Richmond Police	18	Q Was it before or after the warrants was
19	Department actually were the ones that picked up the	19	issued for Mr. Bush's arrest?
20	children at their school in Richmond, Virginia and	20	A I believe it was prior to custody.
21	brought them back to the police station and turned	21	Q Prior to what custody?
22	them over to Mr. Bush?	22	A Prior to custody of the children. I say
23	A Yes, I was.	23	that I'm not certain because I don't remember the
24	Q In that fact scenario what was the policy	24	exact time and date that we discussed it. But for
25	of the police department in turning a child over to	25	us to be involved at that level it would have had to
	Page 34		Page 36
1	a parent who's from Pennsylvania or out of state?	1	have been on the advice, the pre advice of the
2	A What I was led to believe at the time was	2	Commonwealth's Attorney's Office pre custody, before
3	that we were returning children to an individual who	3	we went and picked up the children and returned them
4	had valid right to custody of them based upon a	4	to Mr. Bush.
5	document from out of state which appeared to be	5	Q And the warrants that were issued against
6	valid.	6	Mr. Bush occurred after that period of time; is that
7	Q For the purposes of this question let's	7	right?
8	assume that he did not have a valid court order nor	8	A Yes, sir.
9	did the mother. Neither had a valid court order for	9	Q So you knew when the warrants were issued
10	custody of the children. What rights under your	10	that the Commonwealth's Attorney had instructed the
11	training and policy of the police department did	11	Richmond Police to allow Mr. Bush to leave with the
12	Mr. Bush have to be with his children?	12	children. Is that true?
13	MR. SIMOPOULOS: Objection to form.	13	A There were a whole different set of
14	BY MR. PURICELLI:	14	circumstances based upon --
15	Q If you understand it you can answer it.	15	Q Answer my question and I'll listen to you.
16	A I'm not sure I follow what you're asking	16	MR. SIMOPOULOS: Objection to the form.
17	me to speculate on.	17	THE WITNESS: Can I get the question one
18	Q No. I'm not asking you to speculate.	18	more time?
19	Just tell me based on your training and your	19	MR. PURICELLI: Absolutely.
20	policies at the police department how police	20	BY MR. PURICELLI:
21	officers would handle that matter.	21	Q Is it true that at the time the warrants
22	A If parents are divorced and one from out	22	were issued for Mr. Bush's arrest for abduction of
23	of state wants to come pick up their kid from	23	these children you and the Richmond Police
24	school?	24	Department had received advice from the
25	Q And neither the parent living in Virginia	25	Commonwealth's Attorney to allow him to return to

	Page 37		Page 39
<p>1 Pennsylvania with the children?</p> <p>2 A We received advice from the Commonwealth's</p> <p>3 Attorney. It changed again as to what their advice</p> <p>4 was at one point in time. By the time that the</p> <p>5 children were turned over to Mr. Bush, and then the</p> <p>6 advice changed before I obtained the warrants.</p> <p>7 Q Fair enough. Okay. So at what point in</p> <p>8 time did you recontact -- and I don't mean you</p> <p>9 personally -- but was there contact with the</p> <p>10 Commonwealth's Attorney? Was it after Mr. Bush had</p> <p>11 already left the Commonwealth of Virginia?</p> <p>12 A Yes.</p> <p>13 Q And why did there become a need to</p> <p>14 recontact the Commonwealth's Attorney?</p> <p>15 A Because it was determined that the order</p> <p>16 was vacated for reasons after he left the</p> <p>17 Commonwealth, that there were some material issues</p> <p>18 with the original order that needed to be addressed,</p> <p>19 and that based upon the totality of the</p> <p>20 circumstances constituted abduction.</p> <p>21 Q And is that a conclusion you personally</p> <p>22 reached? Or is that a conclusion reached by another</p> <p>23 person and it was told to you?</p> <p>24 A I was consulted -- I consulted with the</p> <p>25 Commonwealth's Attorney.</p>	<p>1 A Yes. And worked with her. I mean, not in</p> <p>2 the same office or anything but on other cases.</p> <p>3 Q Were they cases of similar factual</p> <p>4 scenarios we've been discussing in the Bush case?</p> <p>5 A I don't recall.</p> <p>6 Q Okay. Who called who?</p> <p>7 A I don't recall. I probably called her</p> <p>8 though.</p> <p>9 Q Okay. And what if anything did you tell</p> <p>10 her?</p> <p>11 A The facts and circumstances.</p> <p>12 Q And those are the facts and circumstances</p> <p>13 that we've been talking about today?</p> <p>14 A Yes, sir.</p> <p>15 Q Are there any others that you would have</p> <p>16 told her that we haven't discussed today?</p> <p>17 A Not that I recall.</p> <p>18 Q Okay. And what advice did she give you?</p> <p>19 A We received advice that there was -- I say</p> <p>20 we. Lieutenant Russell and I received advice that</p> <p>21 facts and circumstances could constitute an</p> <p>22 abduction.</p> <p>23 Q Did she say could or did?</p> <p>24 A I don't recall.</p> <p>25 Q At the time that you received the advice</p>		
	Page 38		Page 40
<p>1 Q You say you, you personally?</p> <p>2 A I would say I was in consultation. I was</p> <p>3 part of the conversations with the Commonwealth's</p> <p>4 Attorney's Office.</p> <p>5 Q And was that before or after Serene</p> <p>6 provided you with a copy of the vacated Luzerne</p> <p>7 County Pennsylvania Court Order?</p> <p>8 A That was after.</p> <p>9 Q Who did you talk to in the Commonwealth's</p> <p>10 Attorney's Office?</p> <p>11 A Mary Langer.</p> <p>12 Q Did you know her?</p> <p>13 MR. SIMOPOULOS: Objection to form.</p> <p>14 BY MR. PURICELLI:</p> <p>15 Q Prior to speaking that date had you had</p> <p>16 conversations with her to know you were taking to</p> <p>17 Mary Langer?</p> <p>18 A Yes, sir.</p> <p>19 Q Okay. And how did you know you were</p> <p>20 talking with Mary Langer, what experience?</p> <p>21 A I recognized her voice.</p> <p>22 Q Had you worked with her before or sought</p> <p>23 advice?</p> <p>24 A Yes.</p> <p>25 Q You sought advice from her?</p>	<p>1 that there could be an abduction did you tell --</p> <p>2 MR. SIMOPOULOS: Objection to form.</p> <p>3 MR. PURICELLI: I don't want to say</p> <p>4 anything incorrect.</p> <p>5 BY MR. PURICELLI:</p> <p>6 Q Did she tell you it could be an abduction</p> <p>7 or would be an abduction?</p> <p>8 MR. SIMOPOULOS: Objection. Asked and</p> <p>9 answered.</p> <p>10 BY MR. PURICELLI:</p> <p>11 Q You can answer that.</p> <p>12 A I don't recall the exact verbiage that she</p> <p>13 used, but there was implication that abduction</p> <p>14 warrants could be sought from the magistrate.</p> <p>15 Q Did you place the substance of this phone</p> <p>16 call down on any document? In other words, did you</p> <p>17 write a report that indicated that I called the</p> <p>18 Commonwealth's Attorney and the following</p> <p>19 information was provided, and the following advice</p> <p>20 was given? Anything like that?</p> <p>21 A No, sir. I didn't.</p> <p>22 Q In the course of your training as a</p> <p>23 supervisor did you receive training about note</p> <p>24 taking and preparing a complete file?</p> <p>25 A Yes, I did.</p>		

	Page 41		Page 43
<p>1 Q Did that training also include notes as to 2 information that you received to allow you to 3 explain why you took a course of action?</p> <p>4 A Yes.</p> <p>5 Q Is there a reason you don't have that note 6 in your file now of that conversation?</p> <p>7 A No. There's no reason. Just went to the 8 magistrate's office pretty much right from that 9 phone call.</p> <p>10 Q I'm going to tell you right off the bat I 11 don't know about Virginia law and procedure on 12 obtaining warrants. Can you tell me the procedure 13 that Virginia uses for an officer to obtain a 14 warrant of arrest from a magistrate?</p> <p>15 A Well, the officer takes the facts and 16 circumstances to the magistrate, appears in person 17 usually or via teleconferencing to the magistrate, 18 states the facts and circumstances of a particular 19 incident, and the magistrate either issues or does 20 not issue a warrant based upon those facts and 21 circumstances after sworn testimony is provided.</p> <p>22 Q Is the procedure recorded when you appear 23 in front of a magistrate? Is it on the record? Is 24 there an actual writing or document as to what you 25 tell the magistrate are the facts and circumstances?</p>	Page 42	<p>1 Q Is that the signature of the person you're 2 describing as Nardella?</p> <p>3 A Yes, sir.</p> <p>4 Q And do you recognize that being the 5 signature of the magistrate named Nardella?</p> <p>6 A I don't know what his signature looks 7 like. And it comes up automatically on the warrant. 8 Or maybe they sign it.</p> <p>9 Q Where do you physically go to do this 10 presentment?</p> <p>11 A It's 200 West Grace Street is where the 12 magistrate's office is. Police Headquarters.</p> <p>13 Q Is there more than one magistrate in that 14 building?</p> <p>15 A Yes, sir.</p> <p>16 Q How many are there?</p> <p>17 A I don't know how many there are. At least 18 eight of them.</p> <p>19 Q How did you come to appear before this 20 magistrate?</p> <p>21 A Subsequent to consulting the 22 Commonwealth's Attorney's Office I went downstairs 23 and obtained a warrant after relaying the facts and 24 circumstances to Mr. Nardella.</p> <p>25 Q How did you come to chose among the eight,</p>	
<p>1 A I don't believe so.</p> <p>2 Q So is it you appear in front of the person 3 yourself, typically you seeking a warrant in this 4 case, and simply tell the person in front of you?</p> <p>5 A Basically that's how it goes.</p> <p>6 Q Is it under oath?</p> <p>7 A Yes, sir.</p> <p>8 Q Was it you who appeared in front of the 9 magistrate to obtain the warrants?</p> <p>10 A Yes, sir.</p> <p>11 Q And what magistrate did you go to?</p> <p>12 A (Reviews documents.) Looks like 13 Magistrate Nardella. N-A-R-D-E-L-A.</p> <p>14 Q Have you been in front of this magistrate 15 before?</p> <p>16 A I believe so.</p> <p>17 Q Is that the last name?</p> <p>18 A Well, I mean, I'm not sure exactly how you 19 spell it, but that's what it looks like on here.</p> <p>20 Q You're looking at what we've already 21 identified as Adams 2, one of the warrants?</p> <p>22 A Yes. A box checked, Magistrate.</p> <p>23 Q And above that appears to be a signature 24 of somebody?</p> <p>25 A Yes.</p>	Page 44	<p>1 this particular magistrate?</p> <p>2 A That's just who was on duty at the time.</p> <p>3 Q When you appeared before him was it during 4 regular business hours or was it after hours?</p> <p>5 A Magistrate's hours run 24 hours a day.</p> <p>6 Q Forgive my ignorance. I know little about 7 Virginia law. So you have a magistrate available to 8 you 24 hours a day?</p> <p>9 A Yes, sir.</p> <p>10 Q Do the magistrates do anything other than 11 review for warrants?</p> <p>12 A They do bond hearings.</p> <p>13 Q Do they actually do court proceedings 14 meaning other than setting bonds or anything like 15 that?</p> <p>16 A Not actual court proceedings. They issue 17 protective orders, emergency protective orders, they 18 issue green warrants or emergency custody orders.</p> <p>19 Q At the time when you appeared before this 20 magistrate were any notes or recordings taken of 21 what you were telling the judge?</p> <p>22 MR. SIMOPOULOS: Objection to form.</p> <p>23 BY MR. PURICELLI:</p> <p>24 Q When you were present did he just listen, 25 or did he tape record?</p>	

	Page 45		Page 47
1	A Not that I know of.	1	to him on just one occasion. Maybe more. But I
2	Q Was he writing anything when you were	2	don't recall the content of the conversation.
3	appearing in front of him?	3	Q Was the conversation occurring after
4	A I don't recall.	4	Mr. Bush left Virginia with the children but before
5	Q Okay. Did you personally appear in front	5	you obtained the warrants for his arrest?
6	of him?	6	A I don't know. I just don't remember.
7	A Yes, sir.	7	Q Was he the only person you spoke to from
8	Q Okay. Aside from what you told me today	8	Pennsylvania about the Bush matter?
9	were the facts and circumstances did you tell him	9	A I believe so.
10	anything different?	10	Q Did you speak with a Trooper McDermott in
11	A I don't recall. I mean, I don't recall	11	the Montoursville Barracks?
12	the exact content of the conversation.	12	A I don't believe so.
13	Q Did you have a conversation with him	13	Q Were you the only person working on the
14	before giving him the facts and circumstances about	14	case to bring the abduction charges which I believe
15	why you were there?	15	were actually classified as kidnapping charges?
16	A I don't believe so.	16	A No, I was not. I was being assisted by
17	Q Did you have a conversation after	17	Lieutenant Russell.
18	obtaining the warrants with him about this matter?	18	Q Were you supervising Lieutenant Russell?
19	A I believe I just left after I obtained the	19	A No, sir. He was my direct supervisor.
20	warrants.	20	Q Are you familiar with what he was doing
21	Q Did you have any conversation with him	21	before the warrants were issued but after Mr. Bush
22	after obtaining the warrants about this case?	22	left in regards specifically to the Bush case?
23	A I don't believe so. I really don't	23	A I don't recall exactly what he was doing.
24	recall.	24	Q What do you recall in general?
25	Q Before you went down and obtained the	25	A I remember he was communicating with
	Page 46		Page 48
1	warrants had you communicated with anybody from	1	either folks in Pennsylvania or the FBI. I don't
2	Pennsylvania in regards to obtaining the warrants?	2	remember which.
3	A Had I communicated with anybody in	3	Q What did Sergeant Tripp tell you?
4	Pennsylvania before obtaining the warrants?	4	A I don't recall.
5	Q Yes.	5	Q What did you tell him?
6	A Yes, I believe I did.	6	A I just remember speaking to him. I don't
7	Q Who did you speak with?	7	remember what the content of the conversation was.
8	A I believe I spoke with a Sergeant Tripp on	8	Q Assuming you called him how would you know
9	one occasion.	9	who to contact?
10	Q Is Sergeant Tripp from the Pennsylvania	10	MR. SIMOPOULOS: Objection to form. You
11	State Police?	11	can answer it.
12	A Yes, I believe so.	12	THE WITNESS: I don't know how I
13	Q Do you have any records or notes created	13	ultimately ended up with him on the phone. But
14	or have been created by other people in regards to	14	like I said, I don't know if he contacted me or
15	that communication with Sergeant Tripp with the	15	if I contacted him. I just don't remember.
16	Pennsylvania State Police?	16	BY MR. PURICELLI:
17	A No, I don't.	17	Q It's not indicated anywhere in your
18	Q Did you contact him or did he contact you?	18	report?
19	A That I don't recall.	19	A I had made a note that I had spoken to
20	Q What was the nature of the communication?	20	Tripp on -- there's no specific date mentioned, but
21	In other words, what information was exchanged?	21	just that I had spoken to him on at least one
22	A I don't exactly recall what we were	22	occasion and that was it.
23	speaking about. It was possible -- I mean, I would	23	Q And this is the note you can't find?
24	be speculating at this point, but it was about	24	A It was jotted down in the margin of one of
25	Mr. Bush and -- I just don't recall. I only spoke	25	these pages (indicates.)